



September 30, 2004

Ms. Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Ex Parte Submission

Re: Unbundled Access to Network Elements, WC Docket No. 04-313

Dear Ms. Dortch:

In a filing on September 28, 2004 in the docket captioned above as well as in CC Docket No. 01-338, *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, Verizon Communications provided notice of its *ex parte* meeting on September 27, 2004 with members of the Wireline Competition Bureau. The ostensible purpose of the meeting was “to discuss Verizon’s perspectives on how the Commission should approach its impairment analysis for high-capacity facilities.” The notice and accompanying attachments indicated instead, however, that Verizon’s *ex parte* presentation was directed at the white paper entitled “Competition in Access Markets: Reality or Illusion,” prepared by Economics and Technology, Inc. on behalf of the Ad Hoc Telecommunications Users Committee and filed on August 26 in CC Docket No. 01-338.

To ensure that the record in WC Docket No. 04-313 is complete, and in light of the Commission’s admonition in paragraph 15 of its Order and Notice of Proposed Rulemaking in this docket, FCC 04-179, rel. August 20, 2004, that parties provide a complete recitation of data filed in other dockets or in other proceedings in the instant docket, rather than incorporate such information merely by reference to such other filings, Ad Hoc hereby files its white paper in WC Docket No. 04-313 to assist parties and the Commission in their analysis of Verizon’s arguments.

Accordingly, pursuant to Section 1.1206(b)(1) of the Commission's Rules, 47 C.F.R. § 1.1206(b)(1), please include in the record for the proceeding captioned above the attached white paper entitled "Competition in Access Markets: Reality or Illusion."

Sincerely,

A handwritten signature in cursive script that reads "Colleen Boothby".

Colleen Boothby

Counsel for
Ad Hoc Telecommunications Users
Committee

Attachment